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Attorneys for Plaintiffs
Service Employees International Union
and 100 Oak Street Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)	CASE NO. C-05 04189 JL
Service Employees)	
International Union and)	STIPULATION TO CONTINUE
100 Oak Street Corporation,)	HEARING ON SUMMARY JUDGEMENT
)	MOTION AND XXXXXX ORDER
Plaintiffs,)	THEREON
)	
v.)	
)	
United States of America by)	
and through the Commissioner)	
of Internal Revenue Service,)	Hearing : Nov. 08, 2006
)	Time : 9:30 A.M.
Defendant.)	Courtroom: F, 15 th FL.
)	

IT IS HEREBY STIPULATED AND REQUESTED by and between the parties to this action, as reflected by the signatures of their respective counsel appearing below, that the hearing on summary judgement motion set for November 08, 2006, at 9:30 A.M., be continued to January 17, 2007, at 9:30 A.M., or to such other date as the court deems appropriate, and that all related filing deadlines be continued for the same period of ten calendar weeks, or to such other dates as the court deems appropriate.

On August 14, 2006, Plaintiff, 100 Oak Street Corporation received a levy notice issued by Defendant stating Defendant has levied for the tax liability pending before this court. Plaintiffs will promptly file an amended complaint to request relief from this levy. Defendant will have 30 days to file an amended answer.

The parties agree that a continuation of the hearing on summary judgment motion, and a continuation of all related filing deadlines, for a period of ten calendar weeks will facilitate the orderly adjudication of this matter, and that such a continuation will result in an efficient utilization of the resources of the court. Such a continuation is in the best interests of the parties. Accordingly, the parties respectfully request that the hearing on summary judgment motion, and all related filing deadlines, be continued for a period of ten calendar weeks, or for such other period of time as the court deems appropriate.

Respectfully submitted,

Dated: September ,2006 TAGGART & HAWKINS

/S/ William E. Taggart, Jr.
William E. Taggart, Jr.
TAGGART & HAWKINS
Attorneys for Plaintiffs
SERVICE EMPLOYEES INTERNATIONAL
UNION & 100 OAK STREET CORPORATION

Dated: September ,2006 KEVIN V. RYAN

United States Attorney

/S/ David L. Denier
David L. Denier
Asst. United States Attorney
Tax Division

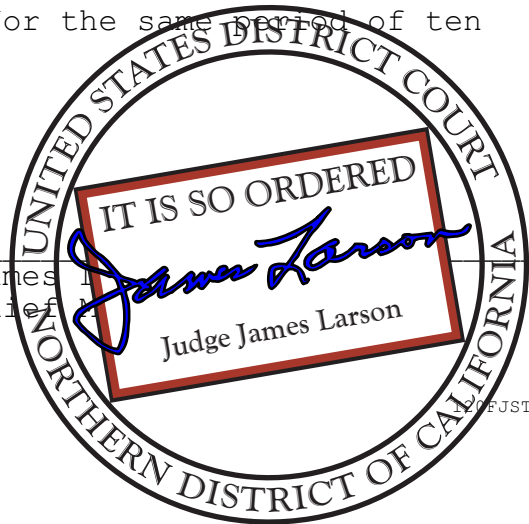
[Proposed] ORDER

Pursuant to the stipulation of the parties as set forth above, and for good cause shown,

IT IS HEREBY ORDERED that the hearing on summary judgment motion currently set for November 08, 2006, at 9:30 A.M., be continued to January 17, 2007, at 9:30 A.M., and that all related filing deadlines, be continued for the same period of ten calendar weeks.

Dated: October 3, 2006

James L.
Chief



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